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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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LUCERO SANCHEZ, :

Plaintiff, :

vs. : Case No.
3:20-cv-00317-MMD-CSD

RENOWN HEALTH, a :
non-profit Nevada :
corporation; et al., :

Defendant. :

=====

DEPOSITION OF GERMAN PINEDA

THURSDAY, AUGUST 18TH, 2022

Reno, Nevada

REPORTED BY: ERIN T. FERRETTO, CCR #281
JOB NO. 899948

GERMAN PINEDA - 08/18/2022

Page 26

1 for the food. I'm not using the menus, but I request
2 every time to her, can we buy the rose this year. Say
3 yes. And I bought nice strawberries with stems -- with
4 long stems, and I'm making covered -- chocolate covered
5 and send one to each resident.

6 Father's Day, we do the same thing, find something
7 special. Christmas. New Year. Thanksgiving.

8 Thanksgiving, we make Thanksgiving dinner for the
9 residents and family. It's like 200, 250 people with
10 that one.

11 Q Okay.

12 A In that time, I bought food not on the menu like
13 whole turkeys, so that I explained but --

14 Q So did Jessi and Justin fire you because they
15 suspected you were stealing?

16 A Yes.

17 Q Okay. And did they tell you that they suspected
18 Ms. Sanchez was helping you?

19 A Not this one.

20 Q Not this one?

21 A Not this one. They say -- they tell me gossip and
22 rumors come to me and spy on employees, that one.

23 Q The gossip and employees?

24 A Yes.

25 Q What were employees gossiping about?

GERMAN PINEDA - 08/18/2022

Page 27

1 A About -- for example, people not happy because not
2 have weekends off, people not happy because change of
3 schedule. But any schedule, this schedule is subject
4 to --

5 Q Subject --

6 A -- subject to change.

7 Q Okay. So the employees weren't happy with the
8 schedules?

9 A Absolutely. And they say this is my -- but, you
10 know, I try to explain to employees, I'm running the
11 place and I'm running the business, and people sick,
12 people call in, we need who can cover.

13 Q So you're running the business, and when people
14 call in, people need to cover the shifts?

15 A Yes.

16 MS. KETNER: I'm going to ask the court reporter
17 to mark our next exhibit, which is Exhibit 3.

18 (Exhibit 3 was marked.)

19 BY MS. KETNER:

20 Q Mr. Pineda, do you recognize this document that
21 we've marked as Exhibit 3, which is Bates stamped RENOWN
22 006422 to RENOWN 006443?

23 A Yes.

24 Q Okay.

25 A Yes.

GERMAN PINEDA - 08/18/2022

Page 28

1 Q What is this document?

2 A It's a document that they -- that I explain to you
3 they give me on the 15.

4 Q Okay. It's your termination --

5 A Yes.

6 Q -- correct?

7 A Yes.

8 Q Okay. And is that your signature --

9 A Yes -- yes.

10 Q Okay -- in the employee signature part on the
11 bottom right-hand corner?

12 A This one?

13 Q Yes.

14 A Yes.

15 Q Okay. Got it. Okay.

16 So when Jessi and Justin terminated you, they said
17 that you had Ms. Sanchez in the position to act as a spy
18 instead of doing her real job, and you argued that that
19 wasn't true; right?

20 A Yes.

21 Q You said that's not true.

22 And then you told Jessi and Justin that
23 Ms. Sanchez was doing an efficient job in her position;
24 right?

25 A Yes.

GERMAN PINEDA - 08/18/2022

Page 80

1 CERTIFICATE OF REPORTER

2

3 STATE OF NEVADA)
4 WASHOE COUNTY) ss.

5

6 I, ERIN T. FERRETTO, Certified Court
7 Reporter for the State of Nevada, do hereby certify;

8 That on Thursday, August 18, 2022, at the
9 offices of Simons Hall Johnston, 690 Sierra Rose Drive,
10 Reno, Nevada, personally appeared GERMAN PINEDA, who was
11 duly sworn by me to testify the truth, the whole truth
12 and nothing but the truth, and thereupon was deposed in
13 the matter entitled herein;

14 That said deposition was taken in verbatim
15 stenotype notes by me, and thereafter transcribed into
16 typewriting as herein appears; that the foregoing
17 transcript, consisting of pages 1 through 79, is a full,
18 true and correct transcription of my stenotype notes of
19 said deposition.

20 That I am not related to or employed by any
21 parties or attorneys herein, nor financially interested
22 in the outcome of these proceedings.

23 DATED: This 13th day of September, 2022.

24

25



ERIN T. FERRETTO, CCR #281